

CLAYMAN LAW GROUP

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Via ECF and Email

Hon. John P. Cronan
U.S. District Court for the Southern District of New York
500 pearl Street, Room 1320
New York, NY 10007
CronanNYSDChambers@nysd.uscourts.gov.

Re: Supplement to Letter Motion Requesting Informal Conference in *Moore, et al. v. Cohen, et al.*, 1:19-cv-4977-ALC

Dear Judge Cronan:

This is to inform you that while Defendants' counsel has asked for deposition dates for my clients Chief Justice Roy Moore and his wife Kayla, they continue to refuse to produce the principal Defendant Sasha Baron Cohen, as if he is a "protected" person, not accountable because of his Hollywood standing and credentials.

Coupled with their obstruction with regard to document production pursuant to your order as set forth in our earlier correspondence, Plaintiffs therefore will raise the issue of sanctions and civil contempt in the proposed conference.

Defendants think they can exert their tremendous financial and other power and influence to play it both ways. We trust that you will not allow this to happen in the interests of due process, and equal protection under the law. We will be submitting further authority in this regard.

Thank you for scheduling the requested hearing as soon as is practicable, as we are in a holiday period and discovery is set to end on January 15, 2021

Respectfully,

Larry Klayman, Esq.
Counsel for Plaintiffs

cc: Elizabeth McNamara, Esq.: lizmcnamara@dwt.com
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Counsel for Defendants